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January 25, 2023

### **VIA ELECTRONIC MAIL**

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RE: Petro Industrial Solutions, LLC v. Island Project and Operating Service, LLC, et. al., Case No. 1:21-CV-00312

Dear Counsel:

Pursuant to the Court's recent Scheduling Order, I provide you with the persons I wish to depose, exclusive of the 30(b)(6) deposition of the Defendants and OPTIS's witnesses, who will need to be scheduled after written discovery when it is completed.

- David Smith
- Merlin Fugueira
- Garry Stoker
- Kenia Johny
- Andreas Constantinou
- Terrence Keogh
- Tom Kologinczak
- Charlotte Pratt-Horowitz
- Rawle Granger
- Coury Hodge
- Chetraum Persaud



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- Frank Keich
- David Redd of Acuren Inspection Services
- 30(b)(6) Versa Integrity
- 30(b)(6) Traeger Brothers
- Sebastian Meretti

Please let me know if any will be voluntarily produced and, if not, their addresses.

I have the following dates to schedule depositions by the deadline of June 16, 2023:

- March 20<sup>th</sup>, 2023, through March 23<sup>rd</sup>, 2023;
- April; 4<sup>th</sup>, 2023, in the afternoon;
- April 5<sup>th</sup>, 2023 and April 6<sup>th</sup>, 2023;
- April 17<sup>th</sup> and April 18<sup>th</sup>, 2023;
- April 25<sup>th</sup>, 2023;
- May 18<sup>th</sup>, 2023 and May 19<sup>th</sup>, 2023;
- May 22<sup>nd</sup>, 2023 and May 23<sup>rd</sup>, 2023;
- May 24<sup>th</sup>, 2023, in the afternoon;
- May 25<sup>th</sup>, 2023 and May 26<sup>th</sup>, 2023;
- May 30<sup>th</sup>, 2023, in the afternoon and May 31<sup>st</sup>, 2023
- June 1<sup>st</sup>, 2023, in the afternoon and June 2<sup>nd</sup>, 2023
- June 5<sup>th</sup>, 2023 through June 9<sup>th</sup>, 2023;
- June 12<sup>th</sup>, 2023 through June 16<sup>th</sup>, 2023.

I will want to take the 30(b)(6) deposition starting June 2<sup>nd</sup>, 2023.

Please respond as to your available dates for depositions, so that we can tie down what dates are available, and get a deposition scheduled to the Court by the deadline.

Cordially,



Lee J. Rohn, Esq.

LJR/kj